

Exhibit 14

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 06 Civ. 0589 (CGE)

5 -----x
6 ANUCHA BROWNE-SANDERS,

7 Plaintiff,

8 - against -

9 MADISON SQUARE GARDEN, L.P., ISIAH LORD
10 THOMAS, III, and JAMES DOLAN,

11 Defendants.

12 -----x
13 December 13, 2006
14 10:10 a.m.

15 VIDEOTAPE DEPOSITION of PETER
16 OLSEN, taken by the Plaintiff, pursuant to
17 Notice, held at the offices of Vladreck
18 Waldman Elias & Engelhard, P.C., 1501
19 Broadway, New York, New York, before
20 Debbie Zaromatidis, a Shorthand Reporter
21 and Notary Public of the State of New
22 York.

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<p>1 OLSEN 2 project -- well, there was a project for 3 Isiah Thomas, and I know there was at 4 least one other one. Oh, well -- well 5 there are -- if you -- I don't know if you 6 consider it a project or not. So, for 7 example, asking me to look into executive 8 education for Anucha Browne-Sanders, I 9 guess that is a project. I think I am 10 missing one, but I -- that's -- that's all 11 I mean. It will come to me. 12 Q. If you think of it later in the 13 deposition, just let me know, and we 14 will -- we will add it. 15 A. Okay. 16 Q. What was the project Mr. Mills 17 asked you to do for Mr. Thomas? 18 A. He -- he wanted me to -- pardon 19 me -- as he termed it help Isiah build his 20 organization. 21 Q. When did Mr. Mills tell you 22 about that project? 23 A. I think the first discussion 24 about that was a telephone call that Steve 25 made to me when I was working at home, and</p>	78	<p>1 OLSEN 2 conversations about it, so what he said 3 exactly on the first I may not get right, 4 but he said that he -- we needed to help 5 him, you know, know what it takes to be 6 successful around here, and I think he 7 was -- he may have used but he certainly 8 was using that frame of reference that I 9 referred to earlier, process, structure, 10 feedback. How do we do things here? What 11 does it take to be successful here? How 12 should he structure his organization? 13 Let's see. What -- and again feedback 14 meaning what types of reports should he 15 get? How should he report to Steve, to 16 Jim and Hank, for example. Those kinds of 17 things. It was sort of like I took it to 18 mean how do we help him understand "The 19 Cablevision or MSG way." 20 Q. Anything else that you can 21 recall during that conversation? 22 A. I listed -- it was sort -- it 23 was a very quick conversation. He named a 24 few different things that I think I 25 captured, but I don't remember</p>	80
<p>1 OLSEN 2 he mentioned that he wanted to help Isiah 3 build his organization. I -- did -- what 4 was your question? 5 Q. Yes. Do you recall when that 6 telephone call took place? 7 A. Yes, I do remember that. That 8 was April 1 I think. I am pretty sure it 9 was April 1. 10 Q. What did Mr. Mills say during 11 that telephone call? 12 A. Well, he said a number of 13 things. I actually wrote them down, and 14 it looks like it that might be the paper 15 that I -- 16 Q. I'll -- I will show you the 17 paper, but I would like just your 18 recollection now of what -- what he said 19 to you. 20 A. Okay. Yeah. He mentioned a 21 number of things that Isiah 22 obviously -- we need to help Isiah build 23 his organization. He -- I think it 24 is -- again this is a very general answer 25 because I -- I know we had a number of</p>	79	<p>1 OLSEN 2 anything -- that is why I take notes and 3 look at notes. 4 Q. Do you remember anything that 5 you said to Mr. Mills during that 6 conversation? 7 A. It was really much more of a 8 one-way conversation because I -- at least 9 I interpreted it as I thought I got an 10 understanding what he was talking about 11 because it's -- again the parlance of MSG 12 and Cablevision is process, structure, 13 feedback. So it made sense, but I -- I am 14 sure we said -- I don't know if I said it 15 or he said it, but I have to believe 16 I -- one of us said something about we 17 will talk some more but keep it in the 18 back of your mind. You know, I'll give 19 you some more dates, but think about it 20 some more, and we will get together and 21 talk some more I think. 22 MS. CACACE: Could you mark 23 this as Olsen 2. 24 A. Okay. Yes. 25 (Olsen Exhibit 2 marked for</p>	81

<p>1 OLSEN 2 identification.) 3 (Document handed to witness.) 4 Q. Okay. What has been marked as 5 Olsen Exhibit 2 is two pages from 6 different calendars. The first one has 7 been identified as MSG 9213, and the 8 second one is MSG 9214. 9 Are those the notes you were 10 referring to when you had the telephone 11 call with Mr. Mills? 12 A. Yes. 13 Q. Could you read -- well, actually 14 starting from the beginning, Deanna Corey, 15 is that what it says? 16 A. Dianella. 17 Q. Who is that? 18 A. Steve Mills' administrative 19 assistant. 20 Q. Did you have a telephone call 21 with her that day? 22 A. No. 23 Q. Do you know what those notes are 24 in reference to? 25 A. Yes.</p>	82	<p>1 OLSEN 2 but -- but it was -- it was like a to do 3 thing that day. 4 Q. What was the thing under Jarret 5 Merrell? 6 A. It says have Vizio because it 7 was -- I think I was as I did often 8 helping a senior -- a senior executive in 9 this case Steve think through our 10 structure, organization charts and 11 options, and it takes a little bit of 12 thought because if you change one thing it 13 means a lot of other things have to 14 change, so they -- they may ask for my 15 help in terms of helping them as a sort of 16 a sounding board, think through org charts 17 of the changes. I do org charts in Vizio, 18 which is a computer program, and I didn't 19 know if they had Vizio, so it is a 20 question. 21 Q. Okay. And this -- the third 22 thing says [REDACTED] 23 A. [REDACTED]. I was -- I think 24 this is what this was, but I had suggested 25 to Steve, you know, that I could be a</p>	84
<p>1 OLSEN 2 Q. What are they reference to? 3 A. This -- Dianella left me either 4 an E mail or voicemail. I think it was a 5 voicemail after a meeting I had with Steve 6 previously, and we were talking -- that 7 was at -- I think that is what I meant by 8 the skunk works project, like high 9 potentials. How do we know who our 10 keepers are? How do we better develop our 11 talent, so forth? After -- I think it was 12 after -- I am pretty sure it was 13 afterthought. Steve had -- he said Jarret 14 Merrell is the kind of person we are 15 talking about. Jarret I think was an 16 intern, seems like a very capable young 17 person. We should sort of latch on to 18 these folks and make sure we develop them 19 and develop it -- so, you know, I think he 20 said to Dianella ask Pete to go meet with 21 Jarret, Jarret Merrell and talk with him 22 and see -- he'll know then a little better 23 what we are -- what we are talking about. 24 So I don't remember if I had already met 25 with Jarret at that time or I was going to</p>	83	<p>1 OLSEN 2 resource on the team side that I had, you 3 know -- I have been -- I have done in a 4 lot of organizational stuff, a lot of team 5 building stuff. Maybe I could 6 provide -- I could be the same type of 7 resource for the Knicks and Rangers and 8 Liberty maybe as I was to senior 9 management. Steve had said talk -- you 10 should really talk to -- you know, get in 11 touch with Lisa Callahan, who was team 12 physician for the Knicks and a lot of that 13 sort of thing sort of I -- I take, you 14 know, was steered through Lisa. So that 15 was a follow-up type thing. 16 Q. Could -- and could you read your 17 notes into the record under Steve Mills? 18 A. Um hum. It says, "Process 19 document regarding employee development 20 draft for discussion purposes Lisa 21 Callahan." Lisa, two bullet points. 22 Q. What does the first one refer 23 to? 24 A. Well, I think it probably refers 25 to -- I put together a process here is how</p>	85

<p>1 OLSEN 2 we could do employee development as a 3 draft, and I either wanted to work on it 4 that day or it wasn't at a meeting I was 5 at home that day. So I think it was 6 something I wanted to do that day, and 7 [REDACTED] was I had either called 8 [REDACTED] and she maybe had called me back or 9 had not called me back, but it was still 10 something that was out there. It wasn't 11 finished, so it was like a reminder to 12 myself. 13 Q. And then what's under that? 14 A. Then it says Rusty, and those 15 are all also I think to dos or just 16 thoughts, set up org chart meetings with 17 Brian Lafemina. 18 Q. Does that have something to do 19 with what you discussed with Mr. 20 McCormack? 21 A. Yes. 22 Q. Okay. And could you read down 23 the rest of that list? 24 A. Yes. It says "don't single out." 25 Never worked as exec."</p>	<p>86</p> <p>1 OLSEN 2 A. Yes, something like that. 3 Q. "Never worked as exec." 4 A. Yes. 5 Q. That is referring to Mr. Thomas 6 has never been an executive before? 7 A. Well, that is interpretation or 8 my notes based on what he said yes. I 9 can't say that Steve said those exact 10 words, yes, but I don't think he said 11 those exact words. 12 Q. Okay. What is the next one 13 under that? 14 A. I think it says basketball. 15 Q. Referring to Mr. Thomas having 16 basketball experience? 17 A. Yes. 18 Q. And the next line? 19 A. "What means to be an exec." 20 Q. What does that refer to? 21 A. That means now he is talking 22 about sort of the gist of this service or 23 consulting assignment project, help Isiah 24 understand what it means to be an 25 executive.</p>
<p>1 OLSEN 2 Q. What does that refer to? 3 A. That is -- this -- at that point 4 this is where I was taking notes on the 5 telephone call from Steve. 6 Q. Okay. So when it says don't 7 single out, what does that refer to? 8 A. Well, I -- I think what he was 9 saying was he didn't -- this is, you know, 10 a very tip -- sort of a typical request. 11 They wanted me to have me work with 12 somebody, but they don't want them to feel 13 like they are being singled out that they 14 are the only one who gets this for, you 15 know, like -- this kind of treatment or 16 whatever I guess or he also could have 17 meant don't -- well, that's -- I would say 18 that is what he meant. 19 Q. And was he referring to Mr. 20 Thomas when he said don't single him out? 21 A. Yes. 22 Q. He didn't want Mr. Thomas being 23 singled out for needing special help? 24 A. Correct. 25 Q. Something like that?</p>	<p>87</p> <p>1 OLSEN 2 Q. And what is the -- 3 A. Here. 4 Q. I am sorry. What was the -- 5 A. Here. 6 Q. At The Garden? 7 A. Right. 8 Q. What is the next line under 9 that? 10 A. Doesn't -- D -- I think that 11 means DK, which means he doesn't know all 12 the ground rules or if you will the -- the 13 subtleties or whatever of MSG/Cablevision. 14 I think that is -- 15 Q. And then there is something with 16 a star? 17 A. "Locker room language." 18 Q. What does that refer to? 19 A. Well, as I think -- as he talked 20 about what he -- what he meant, he said, 21 you know, for example, he's got to know 22 that he can't use locker room language I 23 think he said in the offices or around 24 here or something like that. 25 Q. Did he give you any specifics of</p>

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<p>1 OLSEN 2 a card sort, which is a -- it is a 3 technique that organizational people like 4 myself use. And what we do is go through 5 cards and people prioritize what do you 6 think is most important and next most 7 important at least and so on, so forth. 8 So it starts with a broad deck 9 of cards, and you have a number of 10 different elements, you know, each one 11 having its own like element, and then the 12 participant sorts through them. So this 13 is the most important, and this is -- it 14 is nice to have, but it is not critical, 15 and this is really not relevant, so forth. 16 So it is a way to sort of take this and 17 zero it down. So I talked to him about 18 that approach, and some things I had to 19 build around it I guess or was thinking of 20 building around it. 21 Q. Okay. When -- you said before 22 you -- you came up with this program you 23 had some conversations and did some 24 reality testing ideas. 25 A. Um hum.</p>	106	<p>1 OLSEN 2 Q. Did -- did Mr. Mills ever tell 3 you why he wanted your help to work with 4 Mr. Thomas? 5 MR. GREEN: Objection. Asked 6 and answered. You may answer again, Mr. 7 Olsen. 8 A. Well, it was these reasons here 9 that I mentioned that I think that -- 10 Q. Did he say whether he tried to 11 work with Mr. Thomas previously? 12 A. No, he didn't say. 13 Q. Did he say anything to the 14 effect that he didn't want to hurt his 15 relationship with Mr. Thomas? 16 A. He didn't say that. 17 Q. When -- when you showed 18 the -- this card sort to Mr. McCormack, 19 what did he think of it? 20 A. It -- 21 MR. GREEN: Objection to form. 22 You may answer. 23 A. He thought it was a good idea 24 and a good technique. I don't know that 25 he had ever seen something like that.</p>	108
<p>1 OLSEN 2 Q. Do you recall that you just said 3 that? What -- who did you have 4 conversations with and what were the 5 reality test -- what was the reality 6 testing that you did? 7 A. Well, when I say reality 8 testing, people that I, you know, knew and 9 felt comfortable with whom I could sort of 10 show them like a card sort, Rusty I think 11 -- I am sure I showed Rusty an early draft 12 or the original idea or maybe the cards 13 that are the Lominger cards just as a 14 process. Here is a technique. I showed 15 them to Anucha at lunch on May 11. I 16 think it was May 11. Who else did I show 17 them to? I -- I may have shown them to 18 somebody like Mark Piazza, who I talked to 19 fairly often, and who else? Fran Hurley 20 who is head of training. I think -- I 21 know she saw some iteration of it. It 22 went through several iterations as it sort 23 of evolved just in terms of feedback and 24 what do you think of this. Those people, 25 maybe others.</p>	107	<p>1 OLSEN 2 So I think he -- he was positive for -- 3 toward it. I don't think it was a long 4 discussion, but I know it is -- oh, this 5 is interesting. 6 Q. When -- what was the context in 7 which you showed the cards to 8 Ms. Browne-Sanders? 9 A. It was at lunch on May 11. 10 Q. And what did you tell 11 Ms. Browne-Sanders about your -- about the 12 project you had -- Mr. Mills had asked you 13 to work on with Mr. Thomas? 14 A. Well, you're -- I -- are you 15 asking me the context of the lunch or 16 the -- 17 Q. What -- what did you tell 18 Ms. -- well, did you say to 19 Ms. Browne-Sanders before the lunch 20 any -- anything about the project Mr. 21 Mills asked you to work on with Mr. 22 Thomas? 23 A. I don't think so. It was only a 24 week later, and I don't think I 25 saw -- well, the -- the meeting with Steve</p>	109

<p>1 OLSEN 2 was on the seventh, so I don't think I 3 said anything to Anucha before that. No. 4 Q. Did you ask Ms. Browne-Sanders 5 to lunch for the purpose of discussing Mr. 6 Mills project with her? 7 MR. GREEN: Objection to form. 8 You may answer. 9 A. Say that question again. 10 Q. Did you ask Ms. Browne-Sanders 11 to have lunch with you on May 11, so you 12 could run by some ideas concerning the 13 project Mr. Mills asked you to work on 14 with Mr. Thomas? 15 A. I don't think I asked her to 16 lunch. We had periodically and -- you 17 know, for -- for the past few years, we 18 had lunch, casual lunch, usually set up in 19 passing. We should get lunch. We've got 20 to catch up. Yep, let's catch up. This 21 was one of those occasions, so it 22 wasn't -- the intention of the lunch 23 wasn't -- wasn't, you know -- I don't 24 remember setting it up. I don't know who 25 set it up. I may have or she may have,</p>	<p>110</p> <p>1 OLSEN 2 you know. It may even cascade and become 3 sort of a Knicks program, and I was 4 thinking about an approach. Here 5 is -- could you look at this with me and 6 tell me what you think. This -- something 7 like that. I can't say those are the 8 exact words, but it was -- 9 Q. Did you tell Ms. Browne-Sanders 10 any of the specifics that Mr. Mills had 11 told to you about the reasons he wanted 12 you to help Mr. Thomas? 13 A. Not that I recall. 14 Q. What did Ms. Browne-Sanders say 15 to you when you told her you were -- Mr. 16 Mills had asked you to do a project with 17 Mr. Thomas? 18 A. She said quite a bit actually. 19 She had a lot to say about -- that 20 was -- and these are not the words, but it 21 is -- it was sort of well let me tell you 22 about Mr. Thomas and the Knicks and all 23 that sort of stuff. 24 Q. And what did she say to the best 25 of your recollection?</p>
<p>1 OLSEN 2 but it was -- wasn't set up with -- with 3 an intention of sharing the project, but 4 the lunch I took as an opportunity to take 5 my cards with me to, you know, again ask 6 Anucha to be a sounding board and give me 7 some feedback on it. 8 Q. So what did you say to 9 Ms. Browne-Sanders before you showed her 10 the card sort about the project Mr. Mills 11 had asked you to work on with Mr. Thomas? 12 MR. GREEN: Objection to form. 13 Asked and answered. You may answer again, 14 Mr. Olsen. 15 A. I am sorry to ask you. If you 16 could say that again, please. 17 Q. Sure. 18 MS. CACACE: Could you read 19 that back. 20 (Record read.) 21 A. I don't remember the exact 22 words, but I'm sure I introduced it 23 somehow, and it was something to the 24 effect of Steve has asked me to do a 25 project with Isiah, maybe with the team,</p>	<p>111</p> <p>1 OLSEN 2 A. Well, she -- she prefaced that 3 by saying very clearly that you have to 4 promise you won't say anything about this 5 to anybody, which I -- I said I don't know 6 if I even said anything because I think 7 she leaned forward and, you know, said 8 with great emphasis I mean it. You can't 9 say anything about this to anybody else, 10 and we were at a booth. So I guess I do 11 remember the -- the leaning forward part 12 and the -- the emphasis on her -- desire 13 to emphasize confidentiality is clear to 14 this day in my mind. 15 Q. Okay. And then what else did 16 she say? 17 A. Well, then she launched into a, 18 for lack of a better word, a diatribe I 19 guess about the -- about Mr. Thomas, about 20 the Knicks. You are asking my specific 21 recollections of that? 22 Q. I am -- 23 A. Words said or -- 24 Q. To the best of your 25 recollection -- recollection what did she</p>

<p>1 OLSEN 2 tell you? 3 A. She said that they are a bunch 4 of -- I won't have the word right here 5 because I took notes after the fact, but 6 she said that they are basically a bunch 7 of thugs, that they -- if -- if 8 something -- you know, it's -- I'm 9 thinking -- this probably was my word -- 10 like almost incestuous. If you're not 11 part of this -- she said -- first she 12 described the relationship that Mr. Thomas 13 had with Stephon Marbury that it was very, 14 very close, and she questioned whether or 15 not that was for the good of the team. 16 You know, that their back 17 yards -- they -- they live next to each 18 other. Their back yards abut, that they 19 talk on the phone until 2 in the morning, 20 and that they -- if other players don't go 21 along with, you know, the way that they 22 see the world, they're excluded I guess 23 and that may be my word, but it's like 24 either you're in or you're out. The word 25 thug was used several times. She -- and</p>	114	<p>1 OLSEN 2 you're going to sit on the bench, and 3 that's in my words right there, but -- she 4 mentioned -- she said it would be a 5 media -- media field day if the papers 6 ever got a hold of it. 7 Q. If the papers ever got a hold of 8 what? 9 A. Well, she -- well, she -- again 10 not necessarily in this order, but she 11 said -- she mentioned Petra Pope. She 12 said Petra Pope I think was -- was Magic 13 Johnson's girlfriend, and Isiah knew Petra 14 Pope from that relationship, and that 15 Isiah had asked Petra Pope to go into the 16 referees' locker room before a game and 17 alluded to like make them feel comfortable 18 or see if there is anything they need or 19 something like that. She said that Isiah 20 had been seen leaving a hotel with 21 this -- [REDACTED] What else? 22 I am forgetting things here for sure. I 23 guess that's -- I don't remember 24 anything -- but it was -- that -- that was 25 it.</p>	116
<p>1 OLSEN 2 then she gave me, you know -- she -- I 3 guess she was -- it was a -- she was 4 dumping her bucket I guess is the way I 5 would say it about -- she was illustrating 6 what she meant with some other examples, 7 like the Stephon Marbury and Anucha 8 talking on the phone until 2 in the 9 morning. 10 Q. Stephon Marbury and Anucha -- 11 A. I'm sorry. Isiah Thomas. 12 Q. What else did she tell you about 13 Mr. Thomas? 14 A. She said that it is rule by 15 fear. I remember that. She said -- she 16 mentioned player -- a couple -- I remember 17 her mentioning I think it was Kurt Thomas, 18 who was a Knicks player at the time, that 19 he was -- you know, he wasn't one who was 20 going to go along with this, and that -- I 21 think she said that he said I am not an 22 ass kisser. I'm not going to play their 23 game or something like that, and what she 24 was implying was I think if you don't play 25 along you don't play the game. You know,</p>	115	<p>1 OLSEN 2 Q. Did -- did Mrs. Browne-Sanders 3 say anything to you about her relationship 4 with Mr. Thomas? 5 A. Oh. She said that he said 6 something about -- that he mentioned the 7 word love, and I don't know how he 8 characterized it, that I love you. I'm in 9 love with you or something to that effect, 10 and that they should go off site to plan 11 for a day. To which she quickly added and 12 with emphasis, I told him no way. And 13 when she actually -- now, it is sort of 14 coming back to me, but she said 15 when -- that he said something about I 16 love you or whatever it was that she sort 17 of like -- it's -- because of my training 18 as a psychologist, it is the way she said 19 it I think that -- she said it in a manner 20 that was sort of like she sloughed it off, 21 like what is -- she may have even said 22 what is that supposed to mean. And that I 23 think -- I can't remember anything else 24 about the relationship between the two of 25 them, but those two things were mentioned.</p>	117

<p>1 OLSEN 2 Q. Could you look back at Olsen 3 Exhibit 7 please, which is your 4 typewritten notes. 5 A. Yes. 6 Q. At the top of page 9149, that 7 first paragraph. 8 A. Right. 9 Q. The second sentence says, "Went 10 to Steve Mills rather than human resources 11 on harassment. IT said he was in love 12 with her" with the in love in quotes. Is 13 that what you wrote? 14 A. That's what I wrote. 15 Q. That is not vague, is it? 16 A. Well -- 17 MR. GREEN: Objection to form. 18 It is argumentative. You may answer, Mr. 19 Olsen. 20 A. That wasn't -- well, it wasn't 21 necessarily meant to convey that it -- it 22 was a quote. It was like, you know, how 23 sometimes you put in quotes something that 24 is -- something that's -- I don't know 25 could stand out in some way maybe or a</p>	<p>262</p> <p>1 OLSEN 2 Q. I am sorry. Did you tell Mr. 3 McCormack that Ms. Browne-Sanders had made 4 it clear to you that she had told Mr. 5 Mills about Mr. Thomas' behavior? 6 MR. GREEN: Same objection. 7 You may answer. 8 A. Well, it is right here. I mean 9 I don't remember talking about it, but 10 it's -- 11 Q. You didn't have a conversation 12 with Mr. McCormack about that particular 13 matter, whether Ms. Browne-Sanders had 14 told Mr. Mills? 15 A. Not that I recall. 16 Q. Did you tell Mr. McCormack that 17 Mr. Mills had asked you to meet with Mr. 18 Thomas in part because of locker room 19 language that Mr. Thomas had used? 20 MR. GREEN: Objection to form. 21 Misstates prior testimony. You may 22 answer, Mr. Olsen. 23 A. Yes, that would be 24 uncharacterize -- your unfair 25 characterization of what I -- as I sort of</p>
<p>263</p> <p>1 OLSEN 2 phrase that could convey different things 3 maybe or whatever. 4 Q. Did you ever suggest to 5 Ms. Browne-Sanders that she should go to 6 HR concerning Mr. Thomas' behavior? 7 A. I asked her or even suggested 8 that she go to Steve. She told me she had 9 been to Steve rather than HR. So no, I 10 didn't suggest that she go to HR. 11 Q. Did you tell Mr. McCormack that 12 Ms. Browne-Sanders had made it clear to 13 you that she had told Mr. Mills about Mr. 14 Thomas' behavior? 15 A. Did I make it clear to Mr. 16 McCormack? 17 Q. Yes. 18 MR. GREEN: Objection to form. 19 The document speaks for itself, but you 20 may answer. 21 A. Say again. Sorry. 22 Q. You can answer the question. 23 A. No, I am -- asking. 24 Q. Asking me to repeat. 25 A. Yes.</p>	<p>265</p> <p>1 OLSEN 2 indicated, I tried to keep Rusty informed 3 of what I am doing. I -- I am pretty sure 4 I told him that Steve had asked me to do 5 this project, help Isiah build his 6 organization. I may have mentioned some 7 of the things that he mentioned, but it 8 certainly wasn't characterized as that 9 because of that particular situation. 10 Q. Mr. Mills specifically asked you 11 to deal with Mr. Thomas' language; isn't 12 that correct? 13 MR. GREEN: Objection to form. 14 Misstates prior testimony. You may 15 answer, Mr. Olsen. 16 A. Not really. 17 Q. Not really but he asked you to 18 meet with Mr. Thomas in part because of 19 locker room language? 20 A. That was the original 21 conversation, and he mentioned it as -- as 22 one of a number of ways to describe -- he 23 didn't -- okay. That is it. 24 Q. Did you ever tell Mr. Thomas not 25 to use locker room language in the office?</p>

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
					2	
3	4	5	6	7	8	9
10	11	12	13	14	15	16
	11:00 F. Hurley re, MSG Sports Talent Mgt.		J. Merrell on statistical analyses of team performance		R. McCormack re, research/benchmark ethics training	
17	18	19	20	21	22	23
	Email to R. McCormack re, team psych roles					
24	25	26	27	28	29	30

CONFIDENTIAL

MSG 09214

Olsen, Pete

From: Olsen, Pete
Sent: Tuesday, December 27, 2005 3:45 PM
To: McCormack, Rusty
Subject: May 11 meeting notes



Summary of
Comments from Anucl

Rusty,
Per your request...
Pete

1



CONFIDENTIAL

MSG 09147

Summary of comments from Anucha Browne Sanders
Meeting on 5-11-05

[On the Knicks] its all about rule by fear. Behind the engaging smile Isiah Thomas is a thug. [Will] turn on you in a second. Doesn't trust anybody. Adversarial nature, doesn't see that has to be different in managing people. Street rules apply, profanity- degrades, undermines people if [he] thinks they're not on his side. A ticking time bomb- [would be] a media field day if anything goes public, doesn't get the importance of ethics and standards in a public company (v. an independent team like Dallas).

Dynamic extends thru the team- close (almost incestuous) with Steph Marbury, [their] backyards abut, [IT] talks with SM 'till 2AM- but [this]shouldn't be his role as a Pres / GM- what does this do to the coaches relationship with that player? SM colludes- tension and friction with those who don't go along (P. Hardaway, K. Thomas), SM doesn't communicate with them let alone motivate them- [it is a] gang (posse) mentality, [everybody is either] in or out, nothing in between. KT says "I'm not an ass kisser", SM tries to cut out those he feels don't respect his 'leadership'. SM doesn't really care about the team and others don't trust him- [they know that] anything they say [to SM] will go to IT with a spin on it.

Everybody tries to curry IT's favor. Overall dynamic is that individuals try to take advantage of the dysfunction to further their own agenda, e.g. Frank Murphy will listen to something but then go to IT with that info as his 'confidante' of sorts. Individual agendas [prevail] over team agenda. Everybody is SCARED. FM wants to survive another year or so. He doesn't really have any hidden expertise- [we] could handle it if he left- even the NBA has support on salary cap management (his claim to fame). Nobody is really honest; IT has his posse (M. Aguirre, B. Suhr, and George Glymph. His admin, Raquel Brunette, is IT's cousin [she tells people] "no appointments during All My Children.

Enlist B. Suhr? IT may trust him some, same for Steve Mills, but Steve needs to be more direct, BS could maybe give IT direct feedback [there is a] question re. his trustworthiness too- still may be worth the risk.

IT too close to the team. He HOVERS- always at practice facility or in the aisle on game nights. IT says "we need better players" so he is apt to change out the roster leading to further instability.

[REDACTED] was seen leaving the same hotel with IT several times. The Knicks feared sexual harassment lawsuit if / when she was let go. Players never trusted or talked to her (she used to ask Jamie Matthews how the players were doing).

IT is all ego, narcissistic? 'Little king' quote. All the players have a lot of money, women, etc. and are used to getting whatever they want from an early age.

[Anucha says she has been] very direct with IT, e.g. "nobody tells you the truth". Went to Steve Mills rather than Human Resources on harassment (IT said [he was] "in love" with her), and wanted to go off site for a day to plan. Anucha said "no way".

The team is seriously fractured, low confidence, doesn't care, all [of them] got their millions.

Seems this should infuriate IT. If not, why? Or, it does, and he takes it out in unproductive ways?

Anucha [would] like to get with Steve and me but NOT say we talked. Proposes going to Steve [and say] what are you going to do about this? Maybe to [REDACTED] too at some point

IT's style similar to Jim Dolan's [in that he gets] no real honest feedback, [has] tirades, threats.

Need some form of role negotiation [?] Steve is nice, Herb Williams is too nice, as was Cheney and Wilkens, and players need an ass kicker.

Does IT side with players when [there is] player-management conflict?

Steve is conflict / confrontation avoidant. Rehearse and video coach him too?

Can draw on IT's ego and desire to win championship, i.e. redeem self from questions about the Raptors, CBA, Pacers

IT is calculated and cunning. Knows exactly what he's doing.

IT [said] to Petra Pope Belton (pre-game) "make sure the refs are comfortable" What's that mean? Nobody supposed to be in the room with the refs pre-game. What would the media say if heard the Knicks were trying to influence the refs? PPB was Magic Johnson's girlfriend when IT was dating his current wife so they know each other well.

Role conflict between Anucha and IT. IT doesn't believe in much player-fan interaction to increase sales. Believes players should concentrate on BBall only.

IT an instigator with an explosive temper. With Detroit, Laimbeer was the enforcer, [would] clean up what IT started.

Doesn't see the cultural cues (corporate culture) so he doesn't differentiate street / ghetto norms from corporate ones? Anucha suggests sexual harassment training. Is training the answer? Culture is 'blame frame' and no responsibility.

Exhibit 15



FOR IMMEDIATE RELEASE

News Release

New York Knickerbockers
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ANUCHA BROWNE SANDERS PROMOTED TO SENIOR VICE PRESIDENT, MARKETING & BUSINESS OPERATIONS

NEW YORK, May 13, 2002 – The New York Knickerbockers today announced the promotion of Anucha Browne Sanders to the newly-created position of Senior Vice President, Marketing and Business Operations. Browne Sanders had held the position of Vice President of Marketing since joining the team on Nov. 20, 2000 and will assume her new role immediately.

"Anucha has done an outstanding job in a very short time with the Knicks and is one of the rising stars in the field," said Madison Square Garden President, Sports Team Operations Steve Mills. "This new position will allow her to more effectively set the strategy in leveraging the Knicks' brand."

"It is both an honor and a pleasure to accept this promotion," Browne Sanders said. "The potential of developing the Knicks brand is just beginning to be realized, and I am looking forward to working with our entire team to have us realize that potential."

In her new role, the Brooklyn, N.Y. native will be responsible for the day-to-day management of the business side of the Knicks front office and serve as the team's chief marketing officer. Her responsibilities will be overseeing all of the club's business agendas, including: partnerships, fan development, field marketing, event presentation, community relations, special events and new media. She will work closely with MSG's other sports properties - the New York Rangers and New York Liberty - in finding new and innovative ways to integrate the three very distinct and highly successful brands, and be the primary liaison between the team and the NBA.

Prior to joining the Knicks, Browne Sanders spent 11 years with IBM Corporation, serving in a number of roles, most recently as a Program Manager in IBM's Worldwide Sports Office. In that capacity, she was responsible for a number of IBM's marketing efforts during the Olympic Games (Atlanta 1996, Nagano 1998 and Sydney 2000), including corporate sponsorship efforts that allowed IBM to leverage their investment as a Worldwide Olympic sponsor.

The Northwestern University graduate is also no stranger to success on the hardwood. She was a three-time All Big Ten selection and two-time Big Ten Player of the Year for the Wildcats, finishing her career as the all-time leading scorer in Big Ten women's basketball history, as well as the school's all-time leader in points (2,307) and rebounds (951). Anucha was a two-time Wade Trophy nominee, 1985 Kodak All-American and in her senior season of 1984-85, and led the nation in scoring (a school record 31.5 ppg). She was also selected to play on the U.S. National Team that toured Europe and Asia following her graduation.

Browne Sanders, 38, holds a Bachelors of Science in Communications from Northwestern, and a Masters degree in Marketing communications from Florida State University. Anucha resides with her husband Roy and their three children in New Jersey.

The NBA's New York Knickerbockers basketball team, in its 56th year of operation, is part of Madison Square Garden, L.P.. Cablevision Systems Corporation owns a controlling interest in MSG L.P., which also include the New York Rangers (NHL), the New York Liberty (WNBA), the Hartford Wolf Pack (American Hockey League), the MSG Network, Fox Sports Net and the Madison Square Garden arena complex, located in the heart of the New York metropolitan area.

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NBA World Champions: 1970, 1973 • Eastern Conference Champions: 1951, 1952, 1953, 1970, 1972, 1973, 1994, 1999 • Atlantic Division Champions: 1971, 1988, 1993, 1994

MADISON SQUARE GARDEN
The World's Best Entertainment Arena

MSG 02495

Exhibit 16

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

MADISON SQUARE GARDEN, L.P.,
ISIAH LORD THOMAS III AND JAMES L.
DOLAN,

Defendants.

Civil Case No. 06 Civ. 0589 (GEL)

ECF CASE

**DECLARATION OF
JONATHAN SCHINDEL, ESQ.**

JONATHAN SCHINDEL, ESQ., pursuant to 28 U.S.C. § 1746, declares:

1. I have personal knowledge of the facts set forth in this Declaration.
2. I am a season ticket holder of the New York Knicks and make this Declaration in order to state what I observed and heard during an open practice held by the Knicks on October 30, 2005.
3. I attended the open practice with my wife and two children. A friend of mine, with whom I share season tickets, Robert Levy, also attended the practice.
4. At the practice, Knicks coach Larry Brown had the team do some drills and scrimmage with each other. The event lasted about an hour and a half.
5. During the event, I sat with my family next to the area where players enter the arena.
6. While seated, I saw Isiah Thomas standing about a foot from my seat along with two other people. One of those people was a short, overweight, older gray-haired gentlemen. I am not sure who he was although he did look familiar to me. The other person was a woman who I later learned from press reports was Anucha Browne Sanders.



7. I observed that the three of them stood very close together talking and watching the practice. To the best of my recollection, they were together for approximately half the practice.

8. On several occasions during the practice, someone new would approach Thomas and speak with him. Sometimes he would introduce the person to Ms. Browne Sanders.

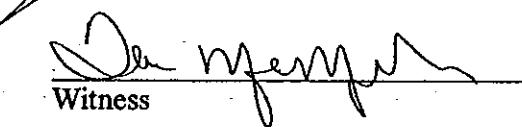
9. During the introductions of Ms. Browne Sanders, he occasionally would place his hand on her arm and comment on her in various ways including comments like "She's so attractive," "She's so beautiful," "I can't concentrate on my work when she's around," and "She's easy on the eyes."

10. As Thomas made these introductions, he appeared to be playing the role of the host of the event and Ms. Browne Sanders did not appear to object. She was smiling during the introductions. She stood by his side and she did not appear to me to be offended or upset. I did not notice her moving away from him or trying to otherwise physically separate herself from him.

11. Months later, when I read about the lawsuit in the newspaper, I recognized Ms. Browne Sanders from her picture in the paper as the woman that I had seen with Thomas during the open practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 23, 2007.


Jonathan Schindel


Witness